

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ABERDEEN ENTERPRISES, INC., a Delaware
Corporation, and LOUISE BLOUIN,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant and Counterclaim Plaintiff

v.

LOUISE BLOUIN,

Counterclaim Defendant.

X

2:22-cv-07190 (LDH)(AYS)

X

AGREED MOTION FOR EXTENSION OF DEADLINES

The plaintiff Aberdeen Enterprises, Inc., the plaintiff and counterclaim defendant Louise Blouin, and the defendant and counterclaim plaintiff United States of America, by undersigned counsel, move for a two-week extension of certain deadlines in the Scheduling Order of June 1, 2023. That Scheduling Order requires that Ms. Blouin's deposition be taken "within the next thirty (30) days," meaning by July 1, 2023. It also requires that the parties "submit a joint status letter on or before July 6, 2023."

Due to logistical and scheduling challenges, the parties are unable to meet the 30-day deadline for the taking of Ms. Blouin's deposition, but they have now agreed for her deposition to be taken on July 14, 2023. The parties request that the Court extend the deadline for the taking of Ms. Blouin's deposition by two weeks to accommodate this schedule. The parties further

request that the deadline for submission of the joint status letter be extended by an equal amount of time through July 20, 2023.

WHEREFORE, the parties ask that the Court enter an Order extending the deadlines for the taking of Ms. Blouin's deposition and submission of the joint status letter by 14 days each.

**ABERDEEN ENTERPRISES, INC.
and LOUISE BLOUIN**

/s/ Brett L. Messinger (consent)

BRETT L. MESSINGER

Duane Morris LLP

30 South 17th Street

Philadelphia, PA 19103

Tel: 215-979-1508

blmessinger@duanemorris.com

UNITED STATES OF AMERICA

/s/ Edward J. Murphy

EDWARD J. MURPHY

ERIC A. ASHBY II

U.S. Department of Justice, Tax Division

P.O. Box 55

Washington, DC 20044

Tel: 202-307-6064 / 202-514-6508

Fax: 202-514-5238

Edward.J.Murphy@usdoj.gov

Eric.A.Ashby@usdoj.gov

Certificate of Service

I certify that on June 23, 2023, I electronically filed the foregoing AGREED MOTION FOR EXTENSION OF DEADLINES and thereby served counsel for all parties.

/s/ Edward J. Murphy

EDWARD J. MURPHY

Trial Attorney, Tax Division